



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET, Rm. 3-177  
NEW YORK, NY 10007

ALAN H. SCHEINER  
Special Federal Litigation Division  
phone: (212) 356-3455  
fax: (212) 356-0399  
email: ascheine@law.nyc.gov

May 3, 2022

**Via ECF**

Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

Re: *John Doe v. City of New York, et al.*,  
22-CV-2690 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the "City"). I write to respectfully request, with the consent of plaintiff's counsel, that the Court: (1) extend the time for the City to respond to the complaint by 60 days from May 5, 2022 to July 5, 2022; and (2) adjourn the initial conference scheduled for May 14, 2022 until July 19, 2022, or a date convenient to the Court following the adjourned time to respond.

By way of background, plaintiff asserts claims under 42 U.S.C. § 1983 and state law for false arrest and malicious prosecution. Plaintiff filed their complaint in redacted form, and the City first received the unredacted complaint on April 22, 2022.

The extension is requested for two reasons. First, because of the complexity of this matter, in which the plaintiff is an alleged confidential informant, the City requires additional time to complete its investigation and response. Second, the undersigned was in Poland last week addressing Ukrainian refugee issues on a volunteer basis, and learned yesterday after returning that I had contracted Covid-19. As a result, I will be out of the office for the next two weeks and generally will not be able to work until symptoms subside. For these reasons, it is respectfully submitted that an adjournment of at least 60 days adjournment is necessary and reasonable. The parties anticipate that additional time is likely to be required, and plaintiffs' counsel have indicated that they would consent to a further reasonable request for an extension by the City, should the City require it.

At this time the individual defendant has not been served. To the extent that the individual defendant is served in the future, the City respectfully requests that the Court *sua sponte* extend the time for that defendant to respond, to coincide with the date of the City's response (if the response would otherwise be due before then). This will allow time for the City to make a determination in response to any request for representation that may be made pursuant to Gen. Mun. Law § 50-k, and will allow all served defendants to respond together which is in the interests of efficiency and judicial economy.

This is the first request for adjournment of the time to answer or the initial conference.

We thank the Court for its consideration in this matter.

Respectfully submitted,  
*Alan H. Scheiner* /s/  
Alan H. Scheiner  
Senior Counsel

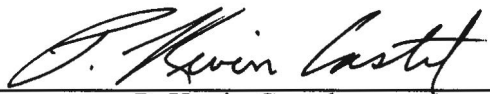
cc (via ECF): All Counsel

Application GRANTED.

Time to respond extended to July 5, 2022. Initial pre-trial conference adjourned to July 25, 2022 at 11:30 AM, to be held telephonically (Dial-in: 1-888-363-4749; Access code: 3667981).

SO ORDERED.

Dated: 5/4/2022

  
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P. Kevin Castel  
United States District Judge